

**FILED**

APR 07 2022

IN THE UNITED STATES DISTRICT COURT  
FOR THE **WESTERN** DISTRICT OF OKLAHOMA

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY                     , DEPUTY

**PRO SE PRISONER CIVIL RIGHTS COMPLAINT****CIV 22 302C**EZEKIEL DAVIS

Plaintiff's full name (Please print)

v.

Case No. \_\_\_\_\_

(To be filled out by Clerk's  
Office only)

KEVIN STIFF, GOVERNOR; AMBER MARTIN, U.P., GEO/  
Defendant(s) full name (Please print)  
LCRF; MARK BOWEN, WARDEN; MR. BOWERS,  
ASST. WARDEN; MR. CALDWELL, ASST. WARDEN;  
MAJOR RITA HOOD; CAPT. JOHN SELLEN; LT.  
COOPER, BUDDY HOWAKER, GEO/LCRF/HSA;

NEXT PAGE 2

For additional names please write "see attached" in the space  
above and attach an additional sheet of paper with the full list  
of names. The names listed in the above caption must be  
identical to those contained in Section IV, pursuant to Fed.  
R. Civ. P. 10(a).

**NOTICE**

Federal Rule of Civil Procedure 5.2 and Local Civil Rule 5.3 address the privacy and security concerns resulting from public access to electronic court files. Under these rules, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Each claim you raise must be properly exhausted. If the evidence shows that you did not fully comply with an available prison grievance process prior to filing this lawsuit, the court may dismiss the unexhausted claim(s) or grant judgment against you. See 42 U.S.C. 1997e(a).

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

CONT. DEFENDANTS

- 10.) JOHN DOE (No. 1) DIRECTOR Wellpath, INC.,
- 11.) JOHN DOE (No. 2) Wellpath, INC., Chief Medical Officer,
- 12.) DR. BOGER, Doctor,
- 13.) MS. TIMM, HEALTH SERVICE ADMINISTRATOR,
- 14.) MS. HARTSOCK, HOUSE 7 & 8 UNIT MANAGER (FORMER HOUSE (I) UNIT MANAGER,
- 15.) SGT. JOHNSON, CORRECTIONAL OFFICER (C.O.),
- 16.) C.O. McCLERGAN, (MALE)
- 17.) C.O. PRESTON, (FEMALE)
- 18.) C.O. ANDERSON, DISCIPLINARY INVESTIGATOR,
- 19.) SGT. DORSEY, DISCIPLINARY HEARING OFFICER,
- 20.) LT. MYERS, GRIEVANCE & MISCONDUCT COORDINATOR,
- 21.) SGT. HATFIELD, (C.O.) (MALE),
- 22.) SGT. GREER, (C.O.) (FEMALE),
- 23.) C.O. MOTEN, (FEMALE),
- 24.) C.O. SLOMECTOR, (MALE),
- 25.) C.O. THOMAS, (NOW SGT. - MALE),
- 26.) C.O. KOBER, (MALE),
- 27.) C.O. MAGEO, (NOW SGT. - FEMALE),
- 28.) C.O. CARGILL, (MALE),
- 29.) C.O. BRANDON, (NOW SGT. MALE),
- 30.) C.O. BUTTERFIELD, (MALE),
- 31.) MS. SMITH, (NURSE),
- 32.) C.O. RHODES, (FEMALE),
- 33.) C.O. BLOVIER, (NOW SGT. - FEMALE),
- 34.) TED WOODHEAD, INSPECTOR GENERAL ODOC,
- 35.) SPENCER KING I.G. AGENT (III),
- 36.) JASON BRYANT, DIRECTOR CLASSIFICATION & POPULATION,
- 37.) RONNIE ALBRIDGE, DIRECTOR ENVIRONMENTAL HEALTH & SAFETY ADMIN.,
- 38.) DR. BRUCE MEYER, ACTING CHIEF MEDICAL OFFICER,
- 39.) LT. ROGERS (MALE),
- 40.) SCOTT CROW, ODOC DIRECTOR,
- 41.) GINETTE NGANG, NURSE PRACTITIONER,

CONT. DEFENDANTS

- 42.) MR. BAKER, ODOC CONTRACT MONITOR
- 43.) Sgt. SCHIERS, (C.O. MALE)
- 44.) Sgt. BORGER (FEMALE)
- 45.) BONNIE GREEN, CLASSIFICATION
- 46.) MRS. MARTI, HOUSE (1) UNIT MANAGER
- 47.) MS. KIRINEY, UNIT MANAGER (HOUSE 4)
- 48.) NURSE MOTT, (FEMALE)



**I. JURISDICTION**

Indicate below the federal legal basis for your claim, if known.

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)

**II. PLAINTIFF INFORMATION**

EZEKIEL DAVIS  
Full name

N/A  
Aliases

186754  
Prisoner ID #

LAWTON CORRECTIONAL FACILITY (LCRF)  
Place of Detention, Incarceration

8607 SE FLOWERMOUND RD.  
Institutional Address

Lawton  
City

OKLA.  
State

73501  
Zip Code

**III. PRISONER STATUS**

Indicate whether you are a prisoner or other confined person as follows:

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

**IV. DEFENDANT(S)' INFORMATION**

List the following information for each defendant. If the correct information is not provided, it could result in the delay or prevention of service. Make sure that the defendant(s) listed below are identical to those contained on the first page. Attach additional sheets of paper as necessary. Do not write on the backs of any additional sheets. See Local Civil Rule 5.2(a).

Defendant 1:

KEVIN SLITT  
Full Name

GOVERNOR  
Current Job Title

STATE CAPITOL, 2300 N. LINCOLN BLVD., SUITE 212  
Current Work Address

OKLA. CITY  
City

OKLA.  
State

73105  
Zip Code

Defendant 2:

AMBER MARTIN,  
Full Name

VICE PRESIDENT GEO/LCRF  
Current Job Title

ONE PLACE

621 N.W. 53RD ST., SUITE 700  
Current Work Address

BOCA RATON  
City

FL  
State

33487  
Zip Code

Defendant 3: MARK BOWEN  
Full Name  
WARDEN  
Current Job Title  
8607 SE Flowermound Rd.  
Current Work Address  
Lawton OKIA. 73501  
City State Zip Code

Defendant 4: MR. BOWERS  
Full Name  
ASST. WARDEN  
Current Job Title  
8607 SE Flowermound Rd.  
Current Work Address  
Lawton OKIA. 73501  
City State Zip Code

Defendant 5: MR. CALDWELL  
Full Name  
ASST. WARDEN  
Current Job Title  
8607 SE Flowermound Rd.  
Current Work Address  
Lawton OKIA. 73501  
City State Zip Code

(DEFENDANTS ADDRESSES)

DEFENDANT 6: MAJOR RITA HOOD, ADDRESS SAME AS ABOVE  
DEFENDANT 7: CAPT. JOHN SELLEN, "  
DEFENDANT 8: LT. COOPER "  
DEFENDANT 9: BUDDY HONAKER "  
DEFENDANT 10: JOHN DOE (No. 1) DIRECTOR WELLPATH, INC.,  
DEFENDANT 11: JOHN DOE (No. 2) WELLPATH Chief Medical Officer  
DEFENDANT 12: DR. BOGER, 8607 SE FLOWERMOUND RD, LAWTON, OKLA. 73501  
DEFENDANT 13: MS. TIMM, HSA, " ADDRESS SAME AS ABOVE "  
DEFENDANT 14: MS. HARTSOCK, "  
DEFENDANT 15: SGT. JOHNSON, "  
DEFENDANT 16: C.O. MCCLEAREN, "  
DEFENDANT 17: C.O. PRESTON, "  
DEFENDANT 18: C.O. ANDERSON, "  
DEFENDANT 19: SGT. DORSEY, "  
DEFENDANT 20: LT. MYERS, "  
DEFENDANT 21: SGT. HATFIELD, "  
DEFENDANT 22: SGT. GREER, "  
DEFENDANT 23: C.O. MOTEN, "  
DEFENDANT 24: C.O. STONECKER, "  
DEFENDANT 25: C.O. THOMAS, "  
DEFENDANT 26: C.O. KOBER, "  
DEFENDANT 27: C.O. MAGEO, "  
DEFENDANT 28: C.O. CARGILL, "  
DEFENDANT 29: C.O. BRANDON, "  
DEFENDANT 30: C.O. BITTERFIELD, "  
DEFENDANT 31: MS. SMITH, "  
DEFENDANT 32: C.O. RHODES, "  
DEFENDANT 33: C.O. GLOVIER, "  
DEFENDANT 34: TED WOODHEAD 3406 N. MARTIN LUTHER KING AVE. OKC 73111  
DEFENDANT 35: SPENCER KING, "  
DEFENDANT 36: JASON BRANT, "  
DEFENDANT 37: RONNIE ALBRIDGE " (6)



(CONT. DEFENDANTS ADDRESSES)

- DEFENDANT 38: DR. BRUCE MEYER 3400 N. MARTIN LUTHER KING AVE, OKC 73111
- DEFENDANT 39: LT. ROGER, 8607 SE FLOWERMOUND RD., LAWTON, OK 73501
- DEFENDANT 40: SCOTT CROW, 3400 N. MARTIN LUTHER KING AVE., OKC 73111
- DEFENDANT 41: GINETTE NGANGA, 8607 SE FLOWERMOUND RD, LAWTON, OK 73501
- DEFENDANT 42: MR. BAKER, DDOC CONTRACT MONITOR, 8607 SE FLOWERMOUND RD, LAWTON, OKLA. 73501
- DEFENDANT 43: SGT. SCHIERS, (C.O. MALE) " "
- DEFENDANT 44: SGT. BERGER (FEMALE) " "
- DEFENDANT 45: BONNIE GREEN, CLASSIFICATION " "
- DEFENDANT 46: MR. MARTI, HOUSE (1) UNIT MANAGER " "
- DEFENDANT 47: MS. KINNY, UNIT MANAGER, HOUSE 4 " "
- DEFENDANT 48: NURSE MOFF " 8607, SE FLOWERMOUND RD  
LAWTON, OKLA. 73501 " "



V. STATEMENT OF CLAIMS

A. Claim 1

Date(s) of occurrence: April 14, 2021; May 17, 2021; Feb. 2, 11, 22, 2022

Place(s) of occurrence: LAWTON CORR. & REHAB. FACILITY LCRF - LAW LIBRARY

State which of your federal constitutional or federal statutory rights have been violated:

FIRST AMENDMENT - DENIAL OF ACCESS TO THE COURT - RETALIATION FOR EXERCISING MY CONSTITUTIONAL RIGHTS - 42 U.S.C. SEC. 1983 CIVIL CONSPIRACY.  
Briefly state the FACTS that support your case. Provide a short and plain statement of how each named defendant was personally involved in the violation of your constitutional rights and why you are entitled to relief from each named defendant. See Fed. R. Civ. P. 8(a). Do not cite case law.

FACTS: SEE: PAGE 8-17

B. Claim 2

Date(s) of occurrence: April 1, 2021, July - MARCH 2022

Place(s) of occurrence: LAWTON CORR. & REHAB. FACILITY (CEO/LCRF)

State which of your federal constitutional or federal statutory rights have been violated:

EIGHTH AMENDMENT VIOLATION, CONTINUOUS VIOLATION FEDERAL LAW EXCESSIVE FORCE/DENIAL OF MEDICAL CARE

FACTS: SEE: PAGE 18-33

**C. Claim 3**

Date(s) of occurrence: April, 2021 - March 2022

Place(s) of occurrence: LAWTON CORR. FACILITY

State which of your federal constitutional or federal statutory rights have been violated:  
CIVIL CONSPIRACY - 42 USC SEC 1983; VIOLATION OF EIGHTH AMENDMENT;  
FOURTEENTH AMENDMENT VIOLATION; CONTINUOUS VIOLATION  
DENIAL DUE PROCESS; EQUAL PROTECTION

FACTS:

SEE: PAGE 34-36

**D. Claim 4**

Date(s) of occurrence: April 1, 2021 - March 2022

Place(s) of occurrence: LAWTON CORR. FACILITY

State which of your federal constitutional or federal statutory rights have been violated:

DECLARATORY JUDGMENT - 28 U.S.C. SEC. 2201

FACTS:

SEE: PAGE 37-40

**E. CLAIM 5**

DATE(S) OF OCCURRENCE: April 2021 - March 2022

PLACE(S) OF OCCURRENCE: LCRF - CEO

STATE WHICH OF YOUR CONSTITUTIONAL OR FEDERAL STATUTORY RIGHTS HAVE  
VIOLATED: THREE (3) STRIKES; FACTS: PAGE 41 -



CLAIM ONE (1)FIRST AMENDMENT VIOLATION  
DENIAL OF ACCESS TO THE COURT/  
RETALIATION FOR EXERCISING MY  
CONSTITUTIONAL RIGHTS/CONSPIRACY

- 1.) ON April 14, 2021, I GAVE C.O. RHODES A CERTIFICATION OF STATEMENT OF INSTITUTIONAL ACCOUNT TO SEND TO THE TRUST FUND OFFICER. I HAD A DEADLINE ON FILED, SHE DID NOT TELL TRUST FUND THAT IT WAS FOR A DEADLINE, I MISSED MY DEADLINE.
- 2.) ON April 19, 2021, C.O. RHODES HAD NOT RECEIVED THE CERTIFICATION OF STATEMENT OF INSTITUTIONAL ACCOUNT, AND TOLD ME MS. CLARK IS THE ONLY PERSON WORKING IN TRUST FUND AND SHE SHOULD HAVE IT DONE SOON, IT WAS NOT AT THE TIME OF THE WRITING OF THIS COMPLAINT. C.O. RHODES RETALIATED WITH A FALSE REPORT.
- 3.) ON April 14, 2021, C.O. RHODES HAD ME REMOVED FROM THE LAW LIBRARY BY SGT. JOHNSON AND LT. COOPER WHO TOLD ME TO JUST GO BACK TO MY UNIT. WHEN I ASKED WHAT I HAD DONE, BECAUSE I HAVE A LEGAL DEADLINE AND NEED TO DO RESEARCH. SGT. JOHNSON AND LT. COOPER SAID I SHOULD LET THEM HAVE A TALK WITH C.O. RHODES TO SEE WHAT'S GOING ON. SGT. JOHNSON LATER TOLD ME C.O. RHODES IS A "DRAMA QUEEN." C.O. RHODES DID NOT ISSUE MISCONDUCT OR ANY REPORTS.
- 4.) ON May 19, 2021, I GO TO THE LAW LIBRARY ON MY HOUSING UNIT DAY - MONDAY, AND ASKED TO FILE A NEW DEADLINE IN A NEW CASE DEALING WITH IN FORMA PAUPERIS. C.O. RHODES REFUSED TO LOG AND DOCUMENT MY DEADLINE. I THEN ASKED C.O. RHODES WHETHER MS. CLARK HAD RETURNED THE CERTIFICATION OF STATEMENT OF INSTITUTIONAL ACCOUNT WITH A SIX (6) MONTH PRINT OUT, C.O. RHODES SAID SHE DID NOT HAVE IT YET. I SHOWED C.O. RHODES THE DEADLINE AND ASKED HAD SHE TOLD MS. CLARK THE FORM WAS ON DEADLINE, SHE (C.O. RHODES) SAID SHE DID NOT TELL HER. I WAS TOLD TO LEAVE FOR SPECIAL COUNSEL.



- 5.) On May 19, 2021, I was in the law library to make up time due to a special count on May 17, 2021 - Monday. I ask C.O. Rhodes whether she had gotten the Certification of Statement of Institutional Account back from Mrs. Clark yet she said no. I again asked if she would let Mrs. Clark know it was for a deadline - Certification of Statement of Institutional Account, C.O. Rhodes refused, denying me access to the court making me deadline.
- 6.) On May 19, 2021, C.O. Rhodes claimed there was no need to file my NEW DEADLINE in a NEW CASE when I told her ODOC Policy OP-030115 states that I have to verify my deadlines with Law Library Supervisor and C.O. Rhodes stated we don't do that at this facility, than call a inmate {Allen Naramore} over who said that I don't need to file the deadline because I have a deadline until June 2021. I explained to inmate Allen Naramore that this was a NEW CASE and that I don't need to explain anything to him because C.O. Rhodes suppose to be train in the law. I asked C.O. Rhodes what her Supervisor name is, she told me Lt. Cooper. SEE: WALL MOUNTED CAMERA LAW LIBRARY.
- 7.) On May 19, 2021 at approximately 10:30 to 11:30 AM C.O. Rhodes called Major Hood, Capt. John Sellen, Lt. Cooper and several other correctional officers. C.O. Moten had the handheld camera, making false report that I was being disruptive.
- 8.) When the above private prison officials arrived I was talking to inmate Allen Naramore calmly. SEE: CAMERA FOOTAGE LAW LIBRARY 11:45 to 12:00 p.m.



9.) On May 19, 2021, I explained to Major Rita Hood and Capt. John Sellen and Lt. Cooper what I was trying to do and C.O. Rhodes was saying I was arguing with inmate Allen Naramore - I said that Allen Naramore a inmate should not have a computer with my legal information on it and he misguided me, ODOC Policy OP-030115 states that I need to provide proof of my deadline, and when my deadline is for trust fund to do something by a certain date, C.O. Rhodes is suppose to inform her that the Certification of Statement of Institutional Account with six(6) month print out is for a deadline, I was made to miss this deadline, on purpose. Major Rita Hood, Capt. John Sellen, Lt. Cooper and several other Correctional Officers told me I was being removed from the Law Library. SEE: CAMERA FOOTAGE LAW LIBRARY May 19, 2021 At 9:30 to 12:00 p.m.

10.) On May 19, 2021, I had done nothing wrong to cause a disturbance, or to be told to leave the Law Library. C.O. Rhodes made an intentional false report that I was behaving aggressively. However, camera footage don't lie, when I approached C.O. Rhodes desk I was not loud or aggressive, I had the paper for my deadline in my hand, and no one paid me any attention, had I gotten loud the other, C.O. Glavier, and inmates would have noticed my actions - camera footage shows C.O. Rhodes "set me up" by making a false report that I was behaving aggressively in the Law Library. Major Rita Hood, Capt. John Sellen, Lt. Cooper all overlooked the fact that when they came into the office - Law Library while I was talking to inmate Allen Naramore I was not loud or aggressive. SEE: CAMERA FOOTAGE



LAW LIBRARY 11:30 A.M. to 12:00 P.M.

- 11.) C.O. Rhodes, false report was the proximate cause as to why Major Rita Hood, Capt. John Sellen, C.O. Cargill, C.O. Brandon, Lt. Cooper, and Sgt. Butterfield was present in the law library on May 19, 2021, and why unnecessary use of force was used. Camera footage from the wall mounted camera shows that I NEVER did anything wrong nor caused any disruption, because when I spoke to C.O. Rhodes at her desk C.O. Clavier was three (3) feet away at her desk sorting and processing inmate request to staff (RTS) and she did not react to anything that I said, had I been behaving aggressively, there were several other inmates present and they did not pay any special attention to the conversation that I was having with C.O. Rhodes and inmate Allen Naramore, I was being denied the freedom of speech concerning my legal rights.
- 12.) C.O. Rhodes, false report alleging that I was behaving aggressively set in motion a chain of events that were intended to deny me access to the court in violation of my First Amendment. C.O. Rhodes had read my RTS concerning black mold in the showers; being price gouged by GEO and Keefe Co., Inc.; Ms. Mott, nurse assaulting me with a needle when she drew my blood that left a half (1/2) dollar size bruise; my RTS to Buddy Henaker and Dr. Byer concerning spinal condition, my RTS to the warden about not receiving medical etc... etc... C.O. Rhodes purposefully harassed and retaliated against me for utilizing the law library, asserting my right and attempting to access the court, I was made a target by C.O. Rhodes and singled out.



13.) Sgt. Johnson, told ME ON April 14, 2021 when he was called to the Law Library by C.O. Rhodes, that she is a "DRAMA QUEEN", and told ME to RETURN to my Housing Unit. Sgt. Johnson did not investigate, and MAINTAINED A CODE OF SILENCE CONCERNING STAFF MISCONDUCT AND VIOLATING MY CONSTITUTIONAL RIGHTS. Sgt. Johnson violated ODOC Policy "Rules Concerning the Individual Conduct of Employees", DP-110215 (1)(A).

Defendants Major Rita Hood; Lt. Cooper, Law Library Supervisor; Mark Bowen, Warden; Mr. Caldwell, Asst. Warden, Capt. John Sellen all should indifference to the illegal conduct of C.O. Rhodes, all BECAUSE SHE WAS HARASSING "ME", whom they all dislike BECAUSE I WAS TRANSFERRED back to GEO/LCRF AND UPON MY ARRIVAL I WAS ASKED "why ARE you back here AFTER the mess you CAUSED the last time you WERE here!", as if I had A say in which facility that I'm transferred to.

14.) I AM ALLEGING that ODOC DIRECTOR Scott Crow, Jason Bryant, Classification & Population Officer, Gray Elliott, Dr. Bruce Meyer, Julie Rose ARE all acting in a concerted effort with Amber Martin, GEO Grp. Inc., VICE PRESIDENT to HAVE ME TRANSFERRED back to GEO/LCRF so that physical harm could be done to ME, delay and denial of adequate medical care, UNNECESSARY force could be used as was done ON May 19, 2021, Feb. 15, 2022, AND I believe that GEO/LCRF employees have pitted gang members against ME by telling them that I AM A "snitch". I AM in imminent danger of suffering serious physical injury at the hands of gang members AND also due to the irreparable harm that's BEING done to my NERVES in my cervical and lumbar spine. SEE: Nos. 38-43.



15) C.O. Rhodes know about BTS No. 204 concerning black mold sent to the Warden Bowen, C.O. Rhodes re-directed the BTS No. 204 to Ms. Clark, Case Manager House One (1) who responded by stating she would talk to Ms. Hartsack Acting Unit Manager - House One - 1, both acted in concert with C.O. Rhodes to hide this fact from the Warden.

Neither Ms. Clark or Ms. Hartsack could do anything about the black mold growing in the showers and cells, and both conspired to keep this fact from the Warden whom NEVER come around - I've NEVER seen any of them. Ronnie Aldridge, Director Environment of Health & Safety Admin.; Julie Rose, Private Prison Contract Monitor; Scott Crow, Director; Anthony Rowell, Deputy Director Region One; Courtney Jones, Deputy Director Region Two Kevin Shitt, Governor all have their heads in the sand, and intentionally don't want to know about the living condition of private prisons - and GEO/LCF are ripping all the benefit while my life is put in danger, by GEO/LCF and ODOC employees conspire to deny me access to the court to bring my claims to the Federal Court system showing deliberate indifference.

16.) I am the Plaintiff in DAVIS v. GEO Grp. Corr. Inc., et al., CV-16-462-WADK, and since my return to GEO/LCF I have been harassed by C.O. Rhodes Law Library employee, her actions are by design and being sanction by GEO/LCF's attorneys Thomas Ferguson and Austin Young, I am alleging that Jason Bryant, Director Classification and Population transferred me to this facility so that I could be harmed, my legal activities monitored in order to cause me to miss deadline and so that C.O. Rhodes can make reports to the above



ATTORNEYS - AS HAS BEEN DONE, WHEN THE ABOVE NAMED ACTED IN CONCERT TO REMOVE ME FROM THE LAW LIBRARY ON FALSE PRETENSE AND PUNISHED ME EVEN AFTER THEY SAW C.O. RHODES HAD MADE FALSE REPORT AGAINST ME, THE DEFENDANTS HEREIN DID VIOLATE CLEARLY ESTABLISHED LAWS.

17.) I wrote to Scott Crow; Ted Woodhead; Jason Bryant Anthony Powell; Courtney Jones; Mr. Bowen; Major Rita Hood; Capt. John Sellen, Lt. Cooper, C.O. Rhodes; C.O. Glavier asking them to investigate and/or for reasons by GEO/LCF employees as to why I was made to leave the law library when camera footage shows that I did nothing to warrant being made/forced to leave the law library and that C.O. Rhodes made a false report that I was behaving aggressively. There is camera support for my claim of not violating any written rules, never showing violent or aggressive behavior; camera footage shows that the defendants that responded to C.O. Rhodes acted in a concerted effort to protect C.O. Rhodes lie and fabrication of a incident. MAY 19, 2021 this incident happened.

Also, these defendants did use excessive force and punished me maliciously even after viewing camera footage that clearly shows that I did nothing to warrant being removed from the Law Library.

The concerted actions of these defendants shows that there is a "code of silence" being maintained concerning GEO/LCF employees/staff misconduct.

Several GEO/LCF employees are "gay" and Major Rita Hood is known to prey on young attractive female staff and a "code of silence" is maintained as well concerning employees relationships, which is also against ODOC Policy Supervisors are NOT suppose have sexual relationships with subordinate staff.



18.) ON MAY 20, 2021, I RECEIVED A DEADLINE WHILE HOUSED IN THE RESTRICTIVE HOUSING UNIT (RHU), I SHOWED C.O. GLOVER, LAW LIBRARY EMPLOYEE WHO HAD JUST STARTED IN THE LAW LIBRARY MAY 2021, AND IS "ON THE JOB TRAINING" UNDER C.O. RHODES. I SENT REQUEST TO STAFF (RTS) TO THE LAW LIBRARY ALONG WITH MY DEADLINE THE TENTH CIRCUIT IN CASE... DAVIS V. CORE CIVIC, INC., et al., CN-18-396-(ED. OK.) ASKING FOR MY LEGAL PROPERTY SO I COULD RESPOND TO THE COURT'S ORDER TO SHOW CAUSE AS WAS ORDERED.

THIS WAS THE SECOND DEADLINE C.O. RHODES AND HER CO-WORKERS AND CO-CONSPIRATORS HAD CAUSED ME TO MISS ON PURPOSE. THE LAW LIBRARY SUPERVISOR, LT. COOPER AND MARK BOWEN, WARDEN DID NOT PROVIDE PROPERTY SUPERVISION OVER THE LAW LIBRARY EMPLOYEES WHOM ARE SUPPOSE TO FOLLOW ODOC-OP-030115.

I WAS MADE TO MISS MY DEADLINE BECAUSE I DID NOT HAVE LEGAL PROPERTY.

19.) ON FEB. 2, 2022, I WAS GIVEN A GRIEVANCE RESTRICTION WARNING IN ORDER TO SILENCE ME IN TWO (2) GRIEVANCE NUMBERS 038-22 AND 048-22 AND 049-22, BY LT. MYERS.

THEN AGAIN ON FEB. 11, 2022, IN GRIEVANCE NUMBERS, 061-22, 063-22 AND 068-22; THESE GRIEVANCES SOUGHT REDRESS AS TO WHY I WAS PLACED ON THE RESTRICTIVE HOUSING UNIT RHU ON 12-6-21 FOR NO REASON(S), WHEN I DID NOT DO ANYTHING ON THAT DAY TO VIOLATE ANY WRITTEN RULES, AND WHY A P.M. I. WAS NOT DONE, WHEN MY LIFE WAS THREATENED.

20.) ON 2-22-22, I WAS PLACED ON GRIEVANCE RESTRICTION UNDER ODOC POLICY OP-D90124, INMATE GRIEVANCE PROCESS SECTION (IX); WITH NO SPECIFICATION AS TO WHICH OF THE SECTIONS THAT I ALLEGEDLY ABUSED.

WHEN THIS RESTRICTION WAS IMPOSED I COULD NOT APPEAL ANY OF THE GRIEVANCES - GRIV. NOS. 115-22; 116-22; 117-22; NOR COULD I RESUBMIT GRIV. NOS. 126-22; 128-22; 129-22; 130-22; 151-22; 152-22; 154-22 EALS.



- 21.) ON MARCH 14, 2022, MARK KNUTSON, Dir. Designee, RETURNED GRIV. NO. 22-38, INSTRUCTING THE WARDEN MARK BOUEN TO FURTHER REVIEW AND INVESTIGATE AND PROVIDE AN AMENDED RESPONSE WITHIN (20) DAYS.
- 22.) DEFENDANT LT. MYERS, IS THE SUPERVISOR FOR BOTH GRIEVANCE AND MISCONDUCT APPEALS - COORDINATOR, DUE TO SHORTAGE OF STAFF AT GEO/LCRF, AND SHE CANNOT BE IMPARTIAL AND DID RETALIATE AGAINST ME AND MADE THE GRIEVANCE PROCESS AN ADVERSARIAL PROCESS.  
I WAS UNABLE TO FILE GRIEVANCE APPEALS - AND/OR GRIEVANCES BECAUSE ONCE PLACED ON GRIEVANCE RESTRICTION I WAS REQUIRED BY ODOC POLICY OP-090124 TO COMPLETE A AFFIDAVIT WITH ALL OF THE GRIEVANCES THAT I'VE FILED WITHIN THE LAST (12) MONTH. I WAS UNABLE TO FILE ANY RESUBMISSIONS, GRIEVANCES OR GRIEVANCE(S) APPEALS BECAUSE I DID NOT HAVE THE DOCUMENTATION IN MY SEGREGATION CELL TO FILL OUT THE AFFIDAVIT CORRECTLY... ODOC POLICY REQUIRE A DESCRIPTION OF THE GRIEVANCE ISSUE, AND THE DISPOSITION AT EACH STAGE(S) INCLUDING DATE GRIEVANCE(S) WAS FILED.
- 23.) THE NAMED DEFENDANTS HEREIN DID RETALIATE AGAINST ME IN VIOLATION OF THE FIRST AMENDMENT - I HAVE BEEN PLACED ON GRIEVANCE RESTRICTION FOR THE LAST FIVE (5) YEARS IN RETALIATION FOR EXERCISING MY CONSTITUTIONAL. THE DEFENDANTS WOULD PLACE ME ON GRIEVANCE RESTRICTION BECAUSE THEY DID NOT WANT TO RESOLVE MY ISSUES, AND/OR PROVIDE ME WITH A RESPONSE SO THAT I COULD APPEAL AND ALLOW ODOC TO BE PUT ON NOTICE ABOUT MY CONDITION OF CONFINEMENT AT GEO/LCRF.
- 24.) ON FEB. 15, 2022, AFTER I SENT GRIEVANCE LISTED ABOVE (AT NOS. 19, 20, 21), I WAS ATTACKED BY GEO/LCRF CERT TEAM USING EXCESSIVE FORCE TO DO A "FORCED CELL MOVE". I WAS PEPPER SPRAYED FOR NO REASON, I HAD NOT DONE ANYTHING TO WARRANT THE USE OF FORCE, I WAS NOT



ENDANGERING MY LIFE OR THE LIFE OF ANYONE ELSE, BECAUSE I WAS IN A CELL BY MYSELF, GEO/LCRF DEFENDANTS, HATHFIELD SCHIERS, ROGERS, BORGES AND A UNIDENTIFIED CORRECTIONAL OFFICER ALL USED UNNECESSARY FORCE TO ENFORCE A GEO/LCRF "HOUSE RULE" - "FORCED CELL MOVES", VIOLATION OF ODOC Policy DP-050108 AND THE EIGHTH AMENDMENT.

25.) IN ODOC Policy DP-050108 - "USE OF FORCE STANDARDS AND REPORTABLE INCIDENTS", SECTION (IX) - "REPORTABLE INCIDENT REPORTING PROCESS", (B), (3) - "ALL USE OF FORCE INCIDENTS."

THIS POLICY MANDATE THAT - ALL USE OF FORCE INCIDENTS ARE REPORTED, HOWEVER WHEN I WAS GIVEN A FALSE MISCONDUCT BY SGT. HATHFIELD, THERE WERE NO "INCIDENT REPORTS" PROVIDED TO ME FROM THE OFFICERS INVOLVED. I COULD NOT DEFEND AGAINST THIS MISCONDUCT BECAUSE I WAS DENIED TO CALL THE CAMERA AS A WITNESS, DEFENDANT C.O. ANDERSON SAID DUE TO ANGLE AND CLARITY SHE COULD NOT SEE THE CERT TEAM COME AROUND AND TOLD ME THEY WERE DOING "FORCED CELL MOVE".

26.) THIS UNNECESSARY USE OF FORCE WAS DONE BECAUSE MARK BOWEN WANTED TO TRANSFER ME WITH A FACILITY SEPARATEES, BUT ODOC CONTRACT MONITOR WOULD NOT APPROVE OF THE REASONS, THE TRANSFER WAS DENIED.

27.) DEFENDANTS MARK BOWEN; BONNIE GREEN; MR. CARLWELL; MR. BAKER, ODOC CONTRACT MONITOR; SGT. HATHFIELD; SGT. SCHIERS; SGT. BORGES; JOHN DOE (NO. 1); LT. ROGERS ALL ENGAGED IN A CIVIL CONSPIRACY TO USE UNNECESSARY FORCE AND MAINTAIN A CODE OF SILENCE AS TO WHY



I WAS PEPPER SPRAYED - TO INTIMIDATE ME AND INFLUENCE ME TO STOP FILING GRIEVANCE ON MY CONDITION OF CONFINEMENT.

CLAIM TWO (2)

DEFENDANTS DR. BOGER, MS. TIMM,  
GEO/LCRF MEDICAL COMPANY Wellpath,  
Sgt. Hatfield, Sgt. GREER, C.O. Moten,  
C.O. STONECTOR, Sgt. THOMAS, C.O. KOBE,  
Sgt. Magee, C.O. Cargill, Sgt. BRANDON,  
C.O. BUTTERFIELD, Sgt. Schiers, VIOLATED  
My Eighth Amendment / USED  
UNNECESSARY FORCE AGAINST ME /  
DENIED AND DELAYED ADEQUATE  
MEDICAL CARE / EIGHTH AMEND. VIOLATION

28.) I ARRIVED AT GEO/LCRF ON April 1, 2021, I submitted sick call slips on April 2, 2021 to let medical and Dr BOGER know that I suffer from "LUMBAR AND CERVICAL DEGENERATIVE DISK DISEASE WITH PROBABLE SPINAL STENOSIS AND RADICULOPATHY", "LUMBAR NEUROPATHY", "SPINAL STENOSIS". THE MEDICAL PERSONNEL WAS PUT ON NOTICE ABOUT MY SPINAL CONDITION, AND I let them all know that I WAS EXPERIENCING NEW PAINS in my LUMBAR AND CERVICAL spine. My appointments were set for two (2) to two and a half (2 1/2) months apart. WHEN I SAW NURSE PRACTITIONER, GINETTE NGANGA she did NOT CONDUCT ANY EXAMINATION in May 2021, I WAS NEVER SEEN ON July 1, 2021, but MRS. NGANGA



submitted a REFERRAL FOR AN MRI, when I already had a MRI done at OLI-Medical Center Oct. 2, 2020 AND was approved to see a Neurologist - Allegedly.

29.) I HAVE "THREE STRIKES" AND IN ACCORDANCE WITH 28 U.S.C. SEC. 1915(g), I MUST SHOW THAT I AM UNDER IMMINENT DANGER OF SERIOUS PHYSICAL INJURY.

I AM HAVING TO GO THROUGH THE SAME LACK OF ADEQUATE MEDICAL CARE FROM GEO/LCRF NEWLY NAMED Wellpath, INC.; EMPLOYEES ARE DELAYING AND DENYING MEDICAL CARE BEING DONE WITHIN A REASONABLE TIME FRAME. THESE ARE VIOLATIONS COMMITTED BY GEO/LCRF EMPLOYEES OF Wellpath, INC. ... Medical Company.

30.) GEO/LCRF Medical Company - Well Path, INC.; DR. BOGER; MS. TIMM, HEALTH SERVICE ADMINISTRATOR ARE NOT FOLLOWING DDOC Policy DP-140121 - "OUTSIDE PROVIDERS FOR HEALTH CARE MANAGEMENT"; THAT MANDATE THAT WHEN A INMATE IS IN NEED OF OUTSIDE MEDICAL CARE THAT IS NOT AVAILABLE AT THE FACILITY, I AM TO BE CLASSIFIED WITHIN FOUR LEVELS OF CARE AND IN ACCORDANCE WITH THE ABOVE POLICY DP-140121 AT SEC. (II) (A) (b) (1) - "Any complaint relating to the head or neck such as SEVERE HEADACHE, NECK STIFFNESS, OR HEAD/NECK"

31.) I AM SUFFERING IN PAIN - THERE ARE SHARP PAINS THAT SHOOT DOWN MY SPINE WHEN I TURN MY HEAD FROM LEFT TO RIGHT, AND ON THE SHOULDER BY THE NECK ON BOTH SIDE MY NECK HURTS TO THE TOUCH; I CANNOT SIT DOWN FOR LONG WITHOUT MY LOWER BACK CAUSING ME EXCRUCIATING PAIN FOR NOW OVER FIVE (5) YEAR I'VE STILL NOT SEEN A QUALIFIED PHYSICIAN - NEUROLOGIST. I AM IN PAIN FROM NERVE DAMAGE, FROM BONES CHIPPING OFF IN MY NECK AND MEDICAL PERSONNEL WILL NOT PROVIDE ANY MEDICAL CARE ... I AM NOT BEING SEEN BY MEDICAL IN A TIMELY MANNER. (19)



32.) I AM HAVING SEVERE PAIN IN MY NECK AND BACK WHEN I LAY DOWN - THE BONES IN MY NECK IS GRINDING AND WHEN A PIECE CHIPS OFF I CAN FEEL IT BECAUSE SHARP PAINS SHOOTS THROUGHOUT MY NECK AND SPINE. I CANNOT LAY ON MY LEFT OR RIGHT SIDE FOR LONG WITHOUT FEELING PAIN THAT STIFFENS MY MOVEMENT, CAUSING ME NOT TO SLEEP MUCH DURING THE NIGHT. WHEN I STAND UP I AM IN SO MUCH PAIN THAT I HAVE TO PUSH MYSELF UP FROM A SITTING POSITION, AND PAIN SHOOT FROM MY NECK ALL THE WAY DOWN MY SPINE AND PAIN IN MY LEGS, BACK OF MY THIGHS HURTS WHEN I TRY TO STAND FROM A SITTING POSITION. ONCE I STAND UP, I AM STARTING TO LEAN FORWARD FROM THE NECK DUE TO THE CERVICAL DEGENERATION FROM WAITING OVER FIVE (5) YEARS TO SEE A NEUROLOGIST TO PROVIDE TREATMENT TO MY NERVES THATS BEING DAMAGED. I AM SUFFER IMMINENT DANGER OF SERIOUS PHYSICAL INJURY.

33.) THE OKLAHOMA DEPARTMENT OF CORRECTIONS UNDER THE SUPERVISION OF GOVERNOR KEVIN STIFT; SCOTT CROW, DIRECTOR; GARY ELLIOTT, GENERAL COUNSEL; JULIE ROSE, MANAGER-PRIVATE PRISON CONTRACT MONITOR; JASON BRYANT DIRECTOR CLASSIFICATION & POPULATION, HAVE ALL SHOWN DELIBERATE INDIFFERENCE TO MY SERIOUS MEDICAL NEEDS BY TRANSFERRING ME BACK TO GEO/LCRF WHERE THE DEFENDANTS AT GEO/LCRF HAVE BEEN ALLOWED TO VIOLATE THEIR CORRECTIONAL SERVICE CONTRACT BY CIRCUMVENTING DDOC POLICIES THAT ARE LISTED IN THE CONTRACT, AND DELAYING MEDICAL CARE FOR THE DAMAGE TO MY NERVE - TO SEE NEUROLOGIST.

34. DEFENDANT BRUCE MEYERS - ACTING CHIEF MEDICAL OFFICER; JASON BRYANT, DIR. CLASSIFICATION & POPULATION SHOULD HAVE KNOWN BEFORE PLACING ME BACK AT GEO/LCRF THAT I STILL



HAVE A PENDING LAW SUIT - DAVIS V. GEO Grp. Corp., INC., et al., CIV-16-462 (U.D. OKLA. PRW-AMG), AND THAT I COULD NOT RECEIVE THE NECESSARY MEDICAL CARE AT GEO/LCRF WHERE MEDICAL CARE WAS DENIED IN MAY 2016 WHEN THE ABOVE CITED CASE WAS INITIALLY FILED.

35.) I AM SUFFERING IN IMMINENT DANGER OF SERIOUS PHYSICAL INJURY BECAUSE MY DOCUMENTED SPINAL INJURY IS CAUSING ME IRREPARABLE NERVE DAMAGE - THERE HAS BEEN MRI'S DONE SEPT. 25, 2020 (CLINIC); AND DEC. 2, 2021 (LUMBAR SPINE ONLY) AT COMANCHE COUNTY MEMORIAL HOSPITAL - HOWEVER AS GEO/LCRF WELLPATH DIRECTOR; CHIEF MEDICAL OFFICER; DR. BOGER, NURSE PRACTITIONER; ODOC CHIEF MEDICAL OFFICER DR. BRUCE MEYER KNOW OR SHOULD HAVE KNOWN IS THAT I HAVE NOT RECEIVE ADEQUATE MEDICAL CARE FOR THE NERVE DAMAGE THAT IS CAUSING ME TO BE IN EXERCUCIATING PAIN.

36.) THE EIGHTH AMENDMENT HAS A OBJECTIVE AND SUBJECTIVE COMPONENT... THE OBJECTIVE COMPONENT IS THE DEFENDANTS KNOW THAT MY MEDICAL CONDITION IS SERIOUS; SUBJECTIVE COMPONENT THE STATE OF MIND OF THE DEFENDANTS WHOM ARE RESPONSIBLE TO PROVIDE ADEQUATE MEDICAL CARE. FOR THE DEFENDANTS SCOTT CROW, JASON BRYANT, DR. BRUCE MEYER TO ALLOW ME TO BE TRANSFERRED BACK TO GEO/LCRF WHERE ODOC POLICY IS NOT BEING FOLLOWED TO PROVIDE ADEQUATE MEDICAL CARE FROM A QUALIFIED PHYSICIAN IS THE DEFINITION OF "CRUEL AND UNUSUAL PUNISHMENT", "DELIBERATE INDIFFERENCE", "UNNECESSARY AND WANTON INFLICTION OF PAIN". SINCE MY ARRIVAL AT GEO/LCRF APRIL 1, 2021 I HAVE NOT RECEIVED ADEQUATE MEDICAL CARE, AND THERE HAS BEEN (2) TO (2 1/2) MONTHS IN DELAY, THEN WHEN I'M SEEN I GET EXCUSES WHY NOTHING MORE CAN BE DONE, EVEN WHEN I TELL DR. BOGER THE MEDS. DON'T WORK

(21)



37) ON April 1, 2021, I WAS PLACED ON QUARANTINE IN HOUSE ONE (1) Delta Pod, Cell 203 WITH OTHER UNINFECTED INMATES. I WAS NEVER CHECKED BY ANY MEDICAL STAFF AND THE HOUSE CORRECTIONAL OFFICER AFTER TWO (2) DAYS TOLD ME AND MY ROOMMATE THAT THE QUARANTINE WAS A JOKE, THIS IS THE DAY I ARRIVED AT GEO/LCF.

38) ON April 13, 2021, I RECEIVED A RESPONSE FROM MEDICAL ON A "REQUEST TO STAFF" (RTS) THAT STATED (IN PART) THAT I HAD AN APPOINTMENT ON April 7, 2021. Dr. Boger. I ASKED C.O. HARDIMAN {FEMALE} WHETHER I COULD GO TO MEDICAL TO FIND OUT WHY I WAS NOT NOTIFIED ABOUT THE APPOINTMENT, C.O. HARDIMAN TOLD ME I COULD GO BUT SHE DON'T KNOW WHETHER THEY WOULD SEE ME. ONCE AT MEDICAL THE CORRECTIONAL OFFICER IN MEDICAL TOLD ME LCF IS NOT A WALK-IN CLINIC, AND I WOULD ONLY BE ADMITTED BY APPOINTMENT ONLY, I RETURN TO MY UNIT.

39) I WAS ISSUED A FALSE MISCONDUCT BY C.O. MILLER WHO FALSELY CLAIMED SHE TOLD ME NOT TO GO, WHICH SHE NEVER DID SAY ANYTHING TO ME. SEE: CAMERA FOOTAGE - HOUSE ONE (1) D-SPACE, April 13, 2021 AT 10:00 TO 1:00 P.M.

40) ON May 4, 2021, I RECEIVED ANOTHER RESPONSE TO A RTS FROM DR. BOGER STATING THAT I HAD AN APPOINTMENT ON April 30, 2021, AGAIN I WAS NEVER NOTIFIED AS I HAD MENTION IN RTS, I RESUBMITTED RTS AND "SICK CALL SLIPS." I WROTE RTS TO MAYOR RITA HOOD AFTER SPEAKING WITH HER IN THE PROGRAM HALLWAY AND SHE TOLD ME TO SEND HER A REQUEST TO STAFF AND SHE WOULD CHECK ON IT - WHY MEDICAL HAD NOT NOTIFIED ME ABOUT MY APPOINTMENTS. INSTEAD ONCE MAYOR RITA HOOD WAS TOLD THAT I HAVE A PENDING CIVIL SUIT ON GEO/LCF - AND MEDICAL COMPANY

(22)



she refused to help me, and told me she was told to ignore me, and that I should send another sick call, I did so.

41.) Buddy Honaker is now GEO/LCF's Wellpath - Health Service Administrator - formally ODOC Chief Medical Officer, and former Defendant in DAVIS v. GEO Cap. Corr. Inc. et al., CIV-16-462 (WACK) - Pending.

Buddy Honaker responded to grievance in 2016 denying me adequate medical care from a qualified physician in the above case, Buddy Honaker's present employment for GEO/LCF Medical Company - newly name "Wellpath" support a connection that in 2016 he was working in a concerted action with GEO/LCF Medical Company in 2016 and should not have been dismissed from the case, he was acting in a concerted effort.

Buddy Honaker is responsible for inmates receiving adequate medical care, but has failed to ensure I receive medical care for my serious medical need.

42.) Ms. Holmberg, Nurse, review all "sick call slips" and is responsible for ensuring inmate notified of upcoming appointments, she fail to make me aware of the appointments. I sent RTS to Dr. Boger and Buddy Honaker HSA and I was not given medical attention within a reasonable amount of time. I was denied continuity of care for my serious medical need and deliberate indifference was shown because my medical record outlines that I suffer from a "degenerate disk disease", "spinal stenosis", "Lumbaro neuropathy" and "radiculopathy" my spine hurts at the neck - there is grind of bone on bone, sharp pains when I have to move my neck, my spine hurts between my shoulders blades, my lower back hurts and I cannot



SIT, STAND OR LAY DOWN WITHOUT MY NECK, SPINAL IN THE MIDDLE AND LOWER BACK CAUSING ME TO BE IN A LOT OF PAIN, I HAVE NOTIFIED MEDICAL EMPLOYEES OF MY SPINAL CONDITION AND GEO/CF MEDICAL EMPLOYEES REFUSE TO SEE ME, APRIL - JUNE 2021.

43.) I let medical DR. BOGER know by way of sick call slips that OBOC discontinued NEUROBIN / GABAPENTIN in JAN. 2021, AND I AM NOT RECEIVING ANY MEDICATIONS THAT HELPS ME TO MANAGE THE PAIN, I let DR. BOGER know that I HAVE BEEN TAKING Ibufrofen FOR OVER THREE (3) YEARS AND WAS TOLD BY A FRIEND THAT THOSE MEDICATIONS ARE NOT INTENDED TO BE TAKEN THAT LONG, WHICH IS WHY I AM HAVING STOMACH PAIN AND PAIN IN MY KIDNEYS. I told DR. BOGER IN RTS AND HE IS SHOWING DELIBERATE INDIFFERENCE TO MY SERIOUS MEDICAL NEEDS AND CAUSING UNJUSTIFIED DELAY OF MEDICAL CARE AND CONTINUITY OF MEDICAL CARE IS BEING DONE ON PURPOSE WITH PURPOSE, IN RETALIATION FOR PENDING CIVIL LITIGATION, SEE: id. DAVIS V. GEO CORP. CORR. INC.

44.) ON MAY 17, 2021, MS. MOTT, NURSE WAS AT THE LAW LIBRARY TAKING ANOTHER INMATE'S BLOOD FOR LAB IN THE HALLWAY. I TOLD HER THAT ABOUT A MONTH AGO APRIL 14, 2021 OR THERE ABOUT I WAS TOLD SHE HAD COME TO HOUSE ONE LOOKING FOR ME FOR LABS. - TO DRAW BLOOD.

MS. MOTT SAID LET ME CHECK, SHE CHECKED AND SAID "YEAH I GOT YOU ON THE LIST." I ASKED HER WHY DIDN'T SHE COME TO THE LAW LIBRARY SINCE SHE WAS TOLD BY C.O.'S WHERE I WAS AT? MS. MOTT SAID SHE WAS BUSY. MS. MOTT, DREW MY BLOOD, BY THE TIME I MADE IT BACK TO HOUSE ONE MY ARM WAS HURTING - THROBBING, SO I TOOK THE BAND-AID OFF AND IT WAS SWOLLEN THE SIZE OF A HALF (1/2) A DOLLAR. I SHOWED MS. HARTSECK AND SHE DID NOTHING; I SHOWED MS. CLARK AND SHE DID NOTHING; I SHOWED MAJOR RITA HOOD; SGT. JOHNSON;



both C.O.'s working on House One - C.O. Preston (Female) and C.O. McCrean and asked them all to call medical and let them know I needed to be seen and I wanted to have a body sheet done. C.O. McCrean a new correctional officer working a couple of months, told me they - medical personnel and Major Rita Hood and Sgt. Johnson told him and C.O. Preston to ignore me.

45.) Ms. Mott, is a trained Phlebotomist and the bruise she left on my arm was done intentionally to hurt me, when she did cause injury to my person she violated Oklahoma Statute - Assault and Battery, when maliciously and sadistically stuck me with a needle and injured my arm causing swelling, bruising and pain for several days and to compound the matter medical (Dr. Boger) Buddy Hanaker, Ms. Mott, Major Rita Hood, Ms. Harbeck, Sgt. Johnson, C.O. Preston and C.O. McCrean all maintained a code of silence concerning Ms. Mott's assault on my person. I sent RTS No. 533 to Warden Bowen and he stated "If she was drawn blood, it is within the scope of her job and in no way an assault." This statement shows the level of deliberate indifference that is exhibited by GEO/LCF employees, and how far GEO/LCF employees will go through to maintain a code of silence concerning GEO/LCF employees misconduct. SEE: CAMERA FOOTAGE LAW LIBRARY HALLWAY MAY 17, 2021, AT 10:30 A.M. TO 12:00 A.M.

46.) On May 19, 2021, at 11:30 to 12:30 p.m. C.O. Rhodes made a false report to Major Rita Hood; Capt. John Sellen; Lt. Cooper; C.O. Cargill was present; C.O. Brandon; and C.O. Butterfield came to the law library under false report that I was behaving aggressively.



SEE: CAMERA FOOTAGE WALL MOUNTED CAMERA AND HAND  
HELD CAMERA OPERATED BY C.O. MOTEN (FEMALE)

47.) THE FEDERAL COURT CAN HAVE SUBJECT MATTER JURISDICTION OVER STATE STATUTE - ASSAULT AND BATTERY. I AM HEREBY MOTIONING THE COURT THAT I WISH TO FILE CHARGES ON MS. MOTT, NURSE; MAJOR RITA HOOD; CAPT. JOHN SELLEN; LT. COOPER; C.O. RHODES; SGT. BUTTERFIELD; C.O. BRANDON; C.O. CARGILL; C.O. GREER (FEMALE); C.O. STONECTOR; C.O. THOMAS; SGT. HATFIELD; C.O. KODER, C.O. MAGEO FOR BEING INVOLVED IN A USE OF FORCE, MAINTAINING A CODE OF SILENCE ABOUT THE FALSE REPORT MADE BY C.O. RHODES WHICH IS THE PROXIMATE CAUSE WHY FORCE WAS USED. SGT. DORSEY, DISCIPLINARY OFFICER SHOWED HE WAS ACTING IN CONCERT WITH CAPT. SELLEN AND SGT. HATFIELD WHO MADE ME UP ON MISCONDUCTS, ALONG WITH C.O. ANDERSON.

48.) THE NAMED DEFENDANTS WERE INVOLVED IN THE FALSE REPORT MADE BY C.O. RHODES AND WAS PRESENT ON MAY 19, 2021 WHEN UNNECESSARY FORCE WAS USED THE FIRST TIME.

MAJOR RITA HOOD; CAPT. JOHN SELLEN, LT. COOPER, C.O. CARGILL, C.O. BRANDON, SGT. BUTTERFIELD, C.O. MOTEN (FEMALE)

CAPT. J. SELLEN ORDERED THE CORRECTIONAL OFFICERS TO APPLY HAND AND ANKLE RESTRAINTS, I WAS ATTACK BY C.O. CARGILL, C.O. BRANDON AND SGT. BUTTERFIELD, WHILE C.O. MOTEN HELD THE HANDHELD CAMERA.

CAPT. J. SELLEN, INCIDENT REPORT STATES THAT I WAS BEHAVING AGGRESSIVE IN THE LAW LIBRARY, CAMERA FOOTAGE SHOW THIS IS A FALSE STATEMENT. SEE: HANDHELD FOOTAGE MAY 19, 2021 11:30-12:00PM. C.O. BRANDON, STATES THAT HE SEARCHED ME WHILE I WAS RESTRAINED, AND I WAS PLACED IN A HOLDING CELL. I WAS TAKEN TWO (2) FEET INSIDE OF RTHC AND PLACED IN A CAGE, NOT IN A CELL.

SGT. BUTTERFIELD STATED HE WALKED ME TO A CAGE. SEE: CAMERA FOOTAGE HANDHELD CAMERA & WALL MOUNTED CAMERA



Lt. Roger used excessive force when he pepper sprayed me for no reason(s) I was not causing harm to myself or others.

49.) On May 19, 2021, at approximately 11:30 to 12:00 p.m. camera footage from handheld camera shows that the use of force was unnecessary, because the probable cause was based on a false report from C.O. Rhodes, also I was not doing anything to warrant force be used. I was not placing anyone else's life in danger, nor the life of myself in danger. SEE: Policy OP-050108 C.O. Anderson intentionally did not document that I was not being disruptive because Capt. Sellen wrote the misconduct, her superior.

50.) On May 19, 2021 at approximately 12:00 p.m. to 1:00 p.m. a correctional officer I do not know his name - came to the cage and asked me to strip naked in the presence of female correctional officer, C.O. Moten holding handheld camera. I refused because I am Muslim and it is against my religion to be naked in the presence of a female that is not my wife. SEE: CAMERA FOOTAGE, HANDHELD CAMERA C.O. MOTEN.

51.) On May 19, 2021 at approximately 1:00 to 2:30 p.m. the second use of force was used, when I had already been searched by C.O. Brandon and was suppose to be placed in a cell - not a cage. There was no need for me to strip naked when I had already been search. I am alleging that the second use of force was done to punish me because Major Rita Hood; Capt. John Sellen, Lt. Cooper had an opportunity to go view law library camera footage and see C.O. Rhodes had indeed made a false report against me. I was pepper sprayed several times, forcefully dragged out of the cage by Sgt. Hatfield spraying me than dragging me out of the cage with C.O. Thomas on my left according to Sgt. Hatfield report, but C.O. Thomas report state he was second and on my right.



C.O. Mageo had the shield and put me in a choke hold head lock cause injury to my neck. I was not resisting or fighting back. C.O. Kober operated the second camera (handheld). C.O. Thomas applied the handcuffs to tight causing injury to my wrist. C.O. Greer (female) she applied shackles so tight that I could not stand or walk, causing injury to my ankles, I had to be carried to the showers. I was stripped naked in front of at least two (2) female staff - C.O. Moten and C.O. Greer on CERT TEAM. On camera I can be heard telling the CERT TEAM that the shackles are to tight. SEE: HANDHELD CAMERA FOOTAGE, NOT DOCUMENTED BY C.O. ANDERSON. Sgt Hatfield stated in his report on second page that he cut my clothes off while in the shower, this was done in the presence of female correctional officers on CERT TEAM.

52.) I sat in a cage from 11:50 to 1:30 p.m. or thereabouts, this was enough time for adequately trained correctional officers who had used force under false pretense to err on the side of caution and view camera footage in the Law Library to ensure my constitutional rights were not being violated - any further. However, instead of doing that which a adequately trained Supervisor would do and should do since several inmates and staff have complained about C.O. Rhodes the Law Library "drama queen".

Mayor Rita Hood watched while excessive force was used and did nothing - didn't even write a report as if she was not even present.

Capt. John Sellen, did not view camera footage in the law library to ensure my rights to access to the courts were not violated, Mayor Rita Hood did not even write any report as if she was not present - because after seeing camera footage she wanted nothing to do with this incident. (28)



53.) ON 7-20-21, AFTER I HAD BEEN COMPLAINING ABOUT black mold in the showers AND leaky roof AT GEO/LCRF ON HOUSE ONE (1), Echo Pod. The Unit Manager, Mrs. Marti set me up by telling gang members that since I had been complaining about black mold in the shower they would be locked - this happen right when Mrs. Marti had allowed House One to go to outside RECREATION, which is RARE BECAUSE GEO/LCRF is short staffed.

54.) I WAS SURROUNDED BY 6 TO 8 INMATES THAT THREATENED TO KILL ME AND TOLD ME I COULD NOT STAY ON THE Pod. At this time HOUSE ONE, Echo Pod WAS DOMINATED BY ONE Security Threat Group (STG) that RUN the Pod. Mrs. Marti WAS UNTRAINED AND INEXPERIENCED AS A Unit Manager July 2021, AND PLACED MY life in danger, Mr. Caldwell, Deputy Warden did NOT do ANYTHING EVEN AFTER I MADE him AWARE OF THE SERIOUS RISK TO MY health AND safety BECAUSE the STG gang is spread out ALL OVER the facility AND they ARE ALL housed together.

55.) I BELIEVE THAT GEO/LCRF Warden Mark Bowen, Mr. Bowers AND Mr. Caldwell showed A RECKLESS DISREGARD for my health AND safety, when they did NOT ACT REASONABLY.

56.) ON 11-26-21, I WAS TOLD BY gang members that Ms. Kinney (U.M.) had GIVEN them documentation that showed that I had COOPERATED in A INSPECTOR GENERAL INVESTIGATION CONDUCTED by SPENCER KING, AGENT CONCERNING A DRUG RING AT OSP - OKLAHOMA STATE PENITENTIARY IN FEB. 2020 THAT RESULTED in A PARTICULAR gang member getting charged, I WAS THREATENED AND TOLD I WOULD BE KILLED IF I STAYED ON HOUSE FOUR CHARLIE.



57.) I believe that ODOC, INSPECTOR GENERAL JOHNNY BLEVIN AND SPENCER KING placed my life in danger when the gang member was charged and allowed to obtain documents that showed I had cooperated in their investigation.

My life has been placed in danger due to ODOC Inspector General Johnny Blevin and Spencer King did show deliberate indifference to my future health and safety when the information that they obtained from me was use to charge a known gang member with ~~introducing~~ drug into a penal institution in Pittsburg County.

These ODOC officials showed a reckless disregard for my health and safety, and I have been labelled a "snitch". I wrote letters to Ted Woodhead and Spencer King and I receive no response.

58.) On Dec. 6, 2021, Mark Bowen had me placed on RH4-Restrictive Housing Unit because he did not want me at GEO/LCRF and submitted a transfer packet with a request for a facility separates on Jan. 11, 2022. When the ODOC Contract Monitor Mr. Baker would not accept the transfer packet on Feb. 15, 2022, I attacked by GEO/LCRF CERT TEAM by being pepper sprayed for no reasons - I had done nothing to warrant the CERT TEAM coming to the cell RH4-B-202 - I was in the cell by myself and had done nothing to warrant unnecessary force being used. The CERT TEAM was enforcing a GEO/LCRF "House Rule" of doing a "Forced Cell Move", I was pepper sprayed and all my property was taken and I was placed on "sack meals", this was punishment for not allowing a cellmate to move into the cell. I was given a false misconduct where the reason that the CERT TEAM used force was to enforce



A GEO/LCRF custom of doing "FORCED CELL MOVES", ORDERED to be PEPPER SPRAY by Lt. ROGERS ON 2-15-22.

59.) ON DEC. 6, 2021, MARK BOWEN ARBITRARILY PLACED ME ON RHU, I HAD NOT DONE ANYTHING ON THAT DATE TO WARRANT BEING PLACED ON RHU. I WANT TO BE COMPENSATE FOR EVERY DAY I WAS ON RHU.

60.) ON FEB. 15, 2022, WHEN THE "FORCED CELL MOVE" WAS DONE I HAD NO RHU DAYS TO SERVE AND REQUESTED TO BE PLACED BACK IN GENERAL POPULATION WHERE THE INMATE WAS COMING FROM THAT WAS BEING FORCED INTO THE CELL WITH ME, AND THE GEO/LCRF - RHU UNIT STAFF AND MR. BOWEN DID NOT WANT TO ALLOW ME BACK IN GENERAL POPULATION.

61.) ON MARCH 10, 2021, MRS. YOUNG, CASE MANAGER RHU ISSUED ME A MISCONDUCT BECAUSE SHE ALLEGED SHE ORDERED ME TO RETURN TO THE GEO/LCRF GENERAL POPULATION, BACK TO HOUSE FOUR (4), THE UNIT THAT I WAS THREATENED ON. I WAS TOLD THAT I COULD NOT BE TRANSFERRED BECAUSE I HAD NOT SUSTAINED ANY BODILY INJURIES FROM GANG MEMBERS; AND THAT ONCE I REFUSE HOUSING MY TRANSFER PACKET WOULD THAN BE ACCEPTED. I ASKED MRS. YOUNG WHY DID I HAVE TO BE GIVEN MISCONDUCTS, PEPPER SPRAYED IF THE WARDEN MARK BOWEN HIMSELF DID NOT WANT ME A GEO/LCRF? MRS. YOUNG COULD NOT ANSWER ME.

62.) I HAVE BEEN MADE A TARGET AT GEO/LCRF THE HIGH RANKING EMPLOYEES WANT HARM TO BE DONE TO ME, AND I HAVE BEEN TOLD BY Lt. COOPER (IN 2016 WAS ONLY A C.O.)



AND Capt. Clark - Parikh (in 2016 was only a C.O.) both have expressed that I got a lot of their friends fired referring to (DAVIS v. GEO. CAP. CORP., INC., CIV-16-462). I believe that due to GEO/LCRF labelling me a "snitch" among gang members, and their uses of UNNECESSARY force against me by placing handcuffs on my wrist to tight causing injury to my wrist - a painful tingle on the outer side of my thumb to my wrist and from the outer side of my pinky to my wrist on both my left and right hands. I was NOT provided medical care on Feb. 15, 2022. I believe I am in imminent danger of suffering serious physical injury by the repeated retaliatory action of the named GEO/LCRF employees, and being set up to be attacked by gang members, when defendants know I suffer a serious spinal injury.

63.) Defendant Governor Kevin Stitt, and Scott Crow, ODOC Director; Mark Bowen, Warden GEO/LCRF; Amber Martin, V.P. GEO/LCRF; Mr. Bowers and Mr. Caldwell, all know or should that that at the GEO/LCRF - this facility does NOT have a COVID-19 Policy and due to GEO/LCRF staff shortage, GEO/LCRF staff are being allowed to come to work sick with COVID-19 to infect inmates.

There's no quarantine pods or units and inmates with COVID-19 are being housed around uninfected inmates.

This act shows deliberate indifference to my health and safety, and my future health and safety.

64.) Defendant Governor Kevin Stitt and Scott Crow have allowed GEO/LCRF under Amber Martin's supervision to violate their Correctional Service Contract between the State and GEO/LCRF in several areas outlined above.



65.) THE DEFENDANTS HEREIN, Scott Crow, ODOC Director; Amber Martin, V.P. GEO/LCRF; Mark Bowen; Mr. Bowers; Mr. Caldwell; Major Hood; HAVE ALLOWED GEO/LCRF/DEFENDANTS TO VIOLATE MY CONSTITUTIONAL RIGHTS IN RETALIATION FOR FILING (DAVIS V. GEO GRP. CORR., INC., ET AL., CIV-16-462) I HAVE SUFFERED CONTINUOUS VIOLATIONS FROM GEO/LCRF Medical Company Wellpath in violation of the Correctional Service Contract. SEE: OK. ST. 57, 1991 SEE: 561; 561.3

66.) THE DEFENDANTS IN THIS CASE ARE CO-CONSPIRATORS TO CAUSE PLAINTIFF INTENTIONAL EMOTIONAL DISTRESS BY THEIR OUTRAGEOUS CONDUCT, BY BEING PLACED BACK AT GEO/LCRF WHERE MEDICAL CARE HAS BEEN DELAYS TO SEE NEUROLOGIST FOR THE NERVE DAMAGE THAT IS CAUSING IRREPARABLE HARM TO MY SPINE DUE TO DELAY IN MEDICAL CARE; THE MENTAL DISTRESS OF BEING IN FEAR OF DEATH BECAUSE GEO/LCRF EMPLOYEES HAVE INTENTIONAL CALLED AND LABELLED ME A "SNITCH"; ALLOWED STG GANG MEMBERS TO THREATEN MY LIFE, AND REFUSE TO TRANSFER ME BECAUSE I HAVE NOT SUFFERED ANY PHYSICAL INJURY WHEN MY SPINAL CONDITION IS SO SEVERE THAT I CANNOT TAKE ANY BLOWS TO MY HEAD OR I WILL PASS OUT IMMEDIATELY. I AM IN FEAR THAT GEO/LCRF EMPLOYEES WILL ALLOW HARM TO BE DONE TO ME AND ALLOW ME TO SUFFER AS THEY HAVE DONE SINCE MY ARRIVAL BY DELAY OF MEDICAL CARE BY A QUALIFIED PHYSICIAN. SEE: PEARSON V. KANCILIA, 70 P.3d 594, 597 (Colo.App. 2003); Churchey v. Adolph Coors Co., 759 P.2d 1336, 1350 (Colo 1988)

Ms. Kinnelley, Mental Health in DEC. 2021 - March 2022 WAS ACTING IN A CONCERTED EFFORT WITH DEFENDANTS BY MAKING FALSE MENTAL HEALTH ASSESSMENTS WHEN SHE CAME THROUGH RTHU TO DO MENTAL HEALTH CHECKS, SHE TOLD OTHER GEO/LCRF EMPLOYEES WHAT HER ASSESSMENT WAS "I THINK EVERYONE IS AGAINST ME," HOWEVER, SHE SEES OVER (100) INMATES AND DOES NOT TAKE NOTES. MY MEDICAL RECORD IS CONFIDENTIAL. (33)



CLAIM THREE (3)

Civil Conspiracy - 42 U.S.C. SEC. 1983  
 In ODOC Allowing GEO/LCRF To  
 Violate The Corrections Service  
 Contract / Violation of Eighth and  
 Fourteenth Amendment  
EQUAL PROTECTION CLAUSE

- 70) THE DEFENDANTS KEVIN STITT; SCOTT CROW; AMBER MARTIN GEO GROUP, INC., V. P.; MARK BOWEN ARE ACTING IN A CONCERTED EFFORT BY FIRST TRANSFERRING ME BACK TO GEO/LCRF WHERE I HAVE BEEN DENIED ADEQUATE MEDICAL CARE BY A QUALIFIED PHYSICIAN, FROM APRIL 1, 2021 TO - DATE. TO SEE A NEUROLOGIST TO READ MRI AND DETERMINE NERVE DAMAGE. I HAVE SUBMITTED SEVERAL "SICK CALL SLIPS" AND I WOULD NOT BE SEEN FOR (2) TO (2 1/2) MONTHS AND WHEN I WAS SEEN NOTHING WAS DONE TO RELIEVE THE PAIN, I WAS MERELY GIVE SMALL DOSES OF MEDICATION THAT DID NOT DO ANYTHING TO RELIEVE THE PAIN.
- 71) GEO/LCRF, MEDICAL COMPANY - Wellpath, INC. AND THEIR DIRECTOR (JOHN DOE NO. 1) AND (JOHN DOE NO. 2) CHIEF MEDICAL OFFICE; BUDDY HONAKER FORMER ODOC CHIEF MEDICAL OFFICER WAS GEO/LCRF Wellpath, INC., HEALTH SERVICE ADMINISTRATOR IN APRIL 2021 WHEN I ARRIVED BACK AT GEO/LCRF. THESE DEFENDANTS HAD ACTUAL KNOWLEDGE OF MY SPINAL CONDITION, AND STILL I WAS TRANSFERRED BACK TO GEO/LCRF WHERE THE MEDICAL CARE THAT I NEED CANNOT BE PROVIDED AT GEO/LCRF, AND DR. BOGER PERSISTENCE IN CONTINUING TO PRESCRIBE THE SAME INEFFECTIVE MEDICATION.



72.) THE DEFENDANTS, ODOC DIRECTOR SCOTT CROW, JASON BRYANT, CLASSIFICATION & POPULATIONS OFFICER ARE ACTING IN CONCERT WITH GEO/LCRF BY HAVING ME TRANSFERRED BACK TO GEO/LCRF WHERE MY FIRST, EIGHTH AND FOURTEENTH AMENDMENT RIGHTS HAVE BEEN VIOLATE, WHEN I WAS ATTACKED BY GEO/LCRF CERT TEAM ON MAY 19, 2021, BASED ON A FALSE REPORT MADE BY C.O. RHODES LAW LIBRARY SUPERVISOR WHO HAD BEEN READING ALL MY "REQUEST TO STAFF" (RTS) COMPLAINING ABOUT BLACK MOLD IN THE SHOWERS, LEAKY ROOF, AND VENTILATION SYSTEM, I WAS PEPPER SPRAYED, STRIP SEARCHED BY FEMALE CORRECTIONAL OFFICER, C.O. GREER AND C.O. MAGEO (BOTH SERGEANTS).

73.) THE DEFENDANTS SCOTT CROW, ODOC DIRECTOR; AMBER MARTIN, GEO GROUP, INC.; MARK BOWEN; JASON BRYANT, CLASSIFICATION & POPULATIONS OFFICER; JOHN DOE (NO. 1) AND JOHN DOE (NO. 2); DR. BOGER; GINETTE NGANGA, NURSE PRACTITIONER ACTED IN A CONCERTED EFFORT TO DENY AND DELAY MEDICAL CARE BY A QUALIFIED PHYSICIAN IN VIOLATION OF MY EIGHTH AMENDMENT ONCE I WAS TRANSFERRED BACK TO GEO/LCRF.

74.) DEFENDANTS GOVERNOR KEVIN STITT; AMBER MARTIN, GEO GROUP, INC., V.P.; SCOTT CROW; MARK BOWEN, HAVE ACTED IN A CONCERTED EFFORT TO ALLOW GEO GROUP, INC. MEDICAL COMPANY WELLPATH, INC., JOHN DOE (NO. 1) AND JOHN DOE (NO. 2) CHIEF MEDICAL OFFICER TO VIOLATE THEIR CONTRACTUAL AGREEMENT BETWEEN THE STATE DEPARTMENT OF CORRECTIONS AND GEO/LCRF IN VIOLATION OF OKLAHOMA STATUTE, TITLE 57 SEC. 561 AND 561.3.

CONT. NEXT PAGE



Cont. No. (74), THE DEFENDANTS LISTED ABOVE KNOW ABOUT THE SYSTEM THEY HAVE CREATE AT GEO/LCRF MEDICAL CARE SYSTEM THAT IS UNABLE TO PROVIDE ADEQUATE MEDICAL CARE, FOR MY SERIOUS MEDICAL NEEDS, AND HAS NOT PROVIDED ANY MEDICAL CARE FOR MY NERVE DAMAGE THAT IS WELL DOCUMENTED.

75.) THESE NAMED DEFENDANTS HAVE CREATED POLICIES THAT ARE NOT WITHIN ODOC POLICIES, GEO/LCRF MEDICAL SYSTEM WAS A CUSTOM OF DELAYING MEDICAL CARE WHEN MY SPINAL CONDITION IS WELL DOCUMENTED AND IS CAUSING ME IRREPARABLE HARM TO MY FUTURE HEALTH, CONSTITUTING CONTINUOUS VIOLATIONS.

76.) DEFENDANTS AMBER MARTIN, GEO/LCRF, V.P.; MARK BOWEN; MR. CALDWELL; MS. MYERS, GRIEVANCE & MISCONDUCT AND SGT. DERSEY, DISCIPLINARY HEARING SUPERVISOR DID CREATED A GRIEVANCE AND MISCONDUCT SYSTEM THAT IS ADVERSARIAL TOWARD "ME" BECAUSE I EXERCISE MY CONSTITUTIONAL RIGHT. I AM MOTIONING THE COURT FOR DECLARATORY JUDGMENT IN ORDER TO DETERMINE THAT THE DEFENDANTS ACTIONS ARE A VIOLATION OF PLAINTIFF'S CONSTITUTIONAL RIGHTS TO SEEK REDRESS TO MY GRIEVANCES; RIGHT TO "ADEQUATE" MEDICAL CARE WITHIN A REASONABLE TIME; DUE PROCESS BEFORE BEING PLACED ON THE RESTRICTIVE HOUSING UNIT (RHU) ON (12-6-22). SEE (No. 58), THESE ACTION REPRESENT THE SYSTEM SET UP AT GEO/LCRF - TO RETALIATE.

77.) ON DEC. 6, 2021, MARK BOWEN ORDER ME TO BE PLACED ON RESTRICTIVE HOUSING UNIT (RHU), SIMPLY BECAUSE HE DID NOT WANT ME AT GEO/LCRF - FACILITY - WHEN MY TRANSFER PACKET WAS SUBMITTED TO MR. BAKER, ODOC CONTRACT MONITOR HE DID NOT ACCEPT THE REASONS FOR TRANSFERRING ME - MR. MARK BOWEN WANTED TO TRANSFER WITH A FACILITY SEPARATEES... I WAS PUNISHED BY BEING



placed on RHU on 12-6-21 when on that date I did nothing to warrant being placed on RHU, in violation of my 14th Amendment.

78.) The Defendants Scott Crow; Jason Bryant and Mark Bowen has set up a system/custom that allows GEO/CRF employees to arbitrarily do anything in violation of ODC Disciplinary Policy OP-060125; and making the Grievance Procedure a adversarial process, when Ms. Myers is Supervisor over the Law Library, Grievance and Misconduct Coordinator, she knows about my complaints in "Requests To Staff" (RTS); March 2022 Ms. Myers placed me on Grievance Restrictions for unfound reasons - she did not specify how I had abused the grievance process OP-070124 SEC. (X). (A) (1), and this action was done in retaliation to silence me, and to avoid dealing with my issues - denying me access to the court.  
CLAIM FOUR (4)

### DECLARATORY JUDGMENT

79.) I AM MOTIONING this Court to clarify my claim, the hurdles to be granted declaratory judgment requires a actual controversy. SEE: 28 U.S.C. SEC. 2201.

The Supreme Court has explained that "the question in each case is whether the facts alleged, under all circumstances show that there is a substantial controversy, between parties having adverse legal interest, of sufficient immediacy and reality to warrant the issuance of a declaratory judgment." SEE: MED. IMMUNE INC. V. GENENTECH, INC., 549 U.S. 118, 137, 137 S. Ct. 764, 166 L. Ed. 2d 604 (2007).

I believe that the controversy in question would be whether



THE STATE OF OKLAHOMA - DEPARTMENT OF CORRECTIONS ALLOWED GEO GROUP, INC., TO VIOLATE ITS CORRECTIONS SERVICE AGREEMENT, WHEN ODOC POLICIES WERE NOT FOLLOWED WHICH LED TO VIOLATION(S) OF MY CONSTITUTIONAL RIGHTS - THE FOLLOWING POLICIES WERE CIRCUMVENTED "INMATE/OFFENDER GRIEVANCE PROCESS, OP-070124; INMATE/OFFENDER DISCIPLINARY PROCEDURE, OP-060125; USE OF FORCE STANDARDS AND REPORTABLE INCIDENTS, OP-050108; OUTSIDE PROVIDER FOR HEALTH CARE MANAGEMENT, OP-140121; RULES CONCERNING THE INDIVIDUAL CONDUCT OF EMPLOYEES, OP-110215; NON-ASSOCIATIONS AND PROTECTIVE MEASURES, ACCESS TO COURT/LAW LIBRARY, OP-030115.

MS. MYERS PLACED ME ON GRIEVANCE RESTRICTION IN RETALIATION FOR EXERCISING MY CONSTITUTIONAL RIGHTS - AND TO SILENCE ME MARCH 2022, MY PROPERTY WAS WITHHELD IN ORDER TO MAKE ME MISS MY GRIEVANCE APPEAL DEADLINE ONCE ON GRIEVANCE RESTRICTION; UNNECESSARY FORCE WAS USED ON FEB. 15, 2022 TO DO A "FORCED CELL MOVE", ENFORCING A GEO/LCRF "HOUSE RULE", WHEN MY TRANSFER WAS NOT APPROVED ON FEB. 14, 2022 GEO/LCRF HIGH RANKING EMPLOYEE RETALIATED IN ORDER TO CAUSE ME HARM AND TO INTIMIDATE ME BECAUSE I HAD COMPLAINED ABOUT "BLACK MOLD" AT GEO/LCRF. THEN ON MARCH 10, 2022 I WAS ORDERED TO GO TO GENERAL POPULATION, I REFUSED <sup>BECAUSE I WAS IN FEAR FOR MY LIFE.</sup> 80.) THE USE OF FORCE INCIDENT WAS NOT REPORTED, SGT. HATFIELD ISSUED ME A FALSE MISCONDUCT ON FEB. 15, 2022 AND C.O. ANDERSON (FEMALE), DISCIPLINARY INVESTIGATOR DENIED ME DUE PROCESS WHEN SHE FALSELY CLAIMED THAT THE CAMERA AT THE END OF THE TOP TIER ON RESTRICTIVE HOUSING UNIT (RHU)-BRAVO SIDE COULD NOT SEE THE CERT TEAM AT MY CELL DOOR (RHU-B-203) DUE TO ANGLE AND CLARITY - THIS WAS FALSE BECAUSE CAPT SELLEN



told me that the camera most definitely could see my cell.

Ms. ANDERSON, conspired with other GEO/LCRF employees to conceal, falsify and deny me due process, because I had done nothing to warrant the CERT TEAM being at the cell RH11-B-202.

81.) Sgt. Haffield, also falsified the misconduct report on Feb. 15, 2020 when he claimed that there were no "staff or inmate witness," the Correctional Officers involved in the use of force - Sgt. Schiers, Sgt. Haffield, John Doe (No. 3), Lt. Rogers, Sgt. Bergers.

82.) GEO/LCRF-Medical Company - Wellpath, Inc., John Doe, (No. 1) Director; John Doe, (No. 2); Dr. Boger, Ms. Ginette Nganga did not provide adequate medical care - I was repeatedly delayed to see neurologist, and a unnecessary referral was approved by Wellpath, Inc. Chief Medical Officer put in by Ms. Ginette Nganga - on 7-1-21, however a MRI was done Sept. 25, 2020 and I was approved to see a neurologist, and Ms. Timm GEO/LCRF, Health Service Administrator allowed a unnecessary referral for MRI to be done, and it was approved by GEO/LCRF Medical Company - Wellpath, Inc.

83.) The approval of referral for MRI 7-1-21 was an admission that this should have been submitted in 2016 in DAVIS V. GEO GRP. CORR. INC., et al., CIV-16-462 (W.D. OKLA) medical care by a qualified physician - neurologist has been delayed for over five (5) years; I am suffering



FROM A DEGENERATIVE DISC DISEASE, THAT IS CAUSING ME IRREPARABLE HARM - NERVE DAMAGE THAT HAS NOT BEEN DETERMINED DUE TO DELAY IN MEDICAL CARE.

84.) I AM MOTIONING THE COURT FOR DECLARATORY JUDGMENT PURSUANT TO 28 U.S.C. SEC. 2201.

I BELIEVE THAT DUE TO THE DELAY IN MEDICAL CARE, THE USE OF UNNECESSARY FORCE AND RETALIATION WARRANT THIS COURT TO PROVIDE AND GRANT DECLARATORY JUDGMENT TO DECLARE MY RIGHTS. SEE: MARTIN OIL CORP. V. LURIE, 417 Fed. Appx. 740, 745 (10th Cir. 2011); STATE FARM FIRE & CAS CO. V. M'HOON, 31 F.3d 979, 983 (10th Cir. 1994)

85.) I BELIEVE THAT I HAVE PRESENTED A CLAIM OF CONTINUOUS VIOLATIONS BY GEO/LCRF MEDICAL COMPANY; JOHN DOE (No. 1) DIRECTOR; JOHN DOE (No. 2) CHIEF MEDICAL OFFICER; AND THAT A CIVIL CONSPIRACY HAS BEEN ONGOING AGAINST ME BY SCOTT CROW, AMBER MARTIN, DR. BOGER, MARK BOWEN BY HAVING ME TRANSFERRED BACK TO GEO/LCRF WHERE I HAVE NOT BEEN MEDICALLY TREATED BY A QUALIFIED PHYSICIAN - NEUROLOGIST.

86.) I WAS HOUSED ON APRIL 2021 - MARCH 2022 AROUND COVID-19 INFECTED INMATES, AND GEO/LCRF ALLOWED THEIR EMPLOYEES TO COME TO WORK WITH COVID-19 DUE TO STAFF SHORTAGE.

87.) TO DETERMINE WHETHER IN MAY 2021, C.O. RHODES FALSE REPORT THAT I WAS CAUSING A DISTURBANCE IN THE LAW LIBRARY WHICH LED TO ME BEING PEPPER SPRAYED AND STRIPPED NAKED IN FRONT OF TWO FEMALE CERT TEAM MEMBERS. ALL OF THE ABOVE WILL BE DISPUTED, HOWEVER THESE CONSTITUTIONAL VIOLATIONS OCCURRED ONCE I RETURNED TO GEO/LCRF APRIL 1, 2021 - MARCH 2022.  
(40)



CLAIM FIVE (5)Plaintiff Has Three Strikes

I AM SUFFERING CONTINUOUS VIOLATION FROM THESE NEW DEFENDANTS, AND I HAVE THREE STRIKES, HOWEVER, MY CONSTITUTIONAL

RIGHTS ARE CONTINUING TO BE VIOLATED BY GEO/LCRF MEDICAL COMPANY - Wellpath, Inc.; which is a new company or HAS BEEN RE-NAMED - FORMERLY "CORRECT CARE SOLUTION".

I AM THE PLAINTIFF IN DAVIS V. GEO GROUP CORRECTIONS, INC., et al., CIV-16-462 (W.D. OKLA) PENDING. SEE: 28 U.S.C. SEC. 1915(G).

I ARRIVED BACK AT GEO/LCRF ON April 1, 2021, AFTER ONLY BEING GIVEN MRIS WITHOUT NEUROLOGIST CARE TO READ MRI TO DETERMINE THE EXTENT OF NERVE DAMAGE TO MY SPINE. SEE: ABOVE NO. 28 - NO. 36.

INSTEAD OF BEING SENT TO A NEUROLOGIST AFTER MRI AT OLIMC Sept 25, 2020 WHILE AT THE OKLAHOMA STATE PENITENTIARY (OSP) AND THE DOCTOR THERE TOLD ME THE PROPER COURSE OF CARE AFTER MRI IS FOR A NEUROLOGIST TO READ MRI TO SEE WHAT NEEDS TO BE DONE AND FIND OUT THE EXTENT OF NERVE DAMAGE. ODOC SCOTT CROW, JASON BRYANT CONSPIRED TO HAVE ME TRANSFERRED BACK TO GEO/LCRF WHERE ADEQUATE MEDICAL CARE WAS DENIED IN THE ABOVE CASE.

ONCE AT GEO/LCRF I WAS DENIED CARE AND NEUROLOGIST WAS DELAYED REPEATEDLY, WHILE GEO/LCRF HARASSED AND RETALIATED AGAINST ME AND EVEN USED UNNECESSARY AGAINST ME, WITHOUT PROVIDING MEDICAL AFTERWARDS - SEE: CAMERA FOOTAGE.

My spinal condition has deteriorated and is CAUSING ME TO BE IN EXCRUCIATING PAIN, MY NECK IS STARTING TO LEAN FORWARD, AND I CAN FEEL BONES AS THEY CHIP OFF MY CERVICAL SPINE, MY NECK HURT WHEN I TOUCH IT, AND SENDS SHARP PAINS DOWN MY SPINE WHEN I TURN MY HEAD FROM LEFT TO RIGHT. WHEN I SIT DOWN FOR LONG PERIODS OF TIME ITS HARD TO STAND DUE TO THE PAIN IN MY LOWER BACK AND THE BACK OF MY LEGS. THESE ARE NEW PAINS AND SYMPTOMS, AND I AM SUFFERING FROM UNDIAGNOSED NERVE DAMAGE DUE TO DELAY OF ADEQUATE MEDICAL CARE.



**VI. RELIEF REQUESTED**

Briefly state what you want the Court to do for you. Do not make legal arguments or cite cases or statutes.

- 1.) DEMAND FOR JURY TRIAL;
- 2.) \$ 200,000.00, EACH DEFENDANT in individual capacity... PUNITIVE DAMAGES;
- 3.) \$ 200,000.00, EACH DEFENDANT in individual capacity... COMPENSATORY DAMAGES;
- 4.) INJUNCTIVE RELIEF,
- 5.) DECLARATORY JUDGMENT,
- 6.) INTEREST TO START DATE LAW SUIT IS FILED;

**VII. PRISONER'S LITIGATION HISTORY**

The "Three Strikes Rule" bars a prisoner from bringing a civil action or an appeal in forma pauperis in federal court if the prisoner has "on three or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

Have you brought any other lawsuits in federal court while a prisoner? ☒ Yes ☐ No

If yes, how many? OVER - 10

Number each different lawsuit below and include the following:

- Name of case (including defendants' names), court, and docket number
- Nature of claim made
- How did it end? (For example, if it was dismissed, appealed, or is still pending, explain below.)
- Did the court assess a "Strike" or find the dismissal a "Prior Occasion" pursuant to 28 U.S.C. 1915 (g).

I DON'T HAVE ALL THE CASES AVAILABLE BECAUSE I AM ONLY ALLOW ONE CUBIC FOOT OF PROPERTY. I DO HAVE "THREE (3) STRIKE". SEE: CLAIM TWO (2), 3 AND 4.



---

---

---

---

---

---

**VIII. PLAINTIFF'S DECLARATIONS:**

I declare under penalty of perjury that the foregoing is true and correct. To the best of my knowledge, information, and belief, this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11 of the Federal Rules of Civil Procedure.

I agree to provide the Court Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Court Clerk's Office may result in the dismissal of my case.

  
Plaintiff's Signature

3-29-22  
Date

I further declare under penalty of perjury that I placed this complaint in the prison's legal mail system, with the correct postage attached, on the 28 day of MARCH, 2022.

  
Plaintiff's Signature

3-29-22  
Date